

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re: New York City Policing During  
Summer 2020 Demonstrations

This filing is related to:  
ALL CASES

No. 20 Civ. 8924 (CM)(GWG)

**STIPULATION AND [PROPOSED]  
ORDER**

**IT IS HEREBY STIPULATED AND AGREED**, by the non-stayed Plaintiffs and Defendants, that the Defendants will produce to the non-stayed Plaintiffs the responsive and non-privileged texts of Former Commissioner Dermot Shea no later than 4 p.m. on June 9, 2023. If Defendants withhold any responsive texts in full as privileged, they shall produce a privilege log within one week of production.

Dated: New York, New York  
June 7, 2023

**STIPULATED AND AGREED:**

Hon. Sylvia O. Hinds-Radix  
Corporation Counsel of the City of New York  
100 Church Street Rm. 3-207  
New York, NY 10007

By: *Amy Robinson*  
Amy Robinson  
Senior Counsel

*Counsel for Defendants*

NEW YORK CIVIL LIBERTIES UNION FOUNDATION

By: s/Molly K. Biklen

Molly K. Biklen  
Perry Grossman  
Jessica Perry  
Daniel R. Lambright  
Robert Hodgson  
Veronica Salama  
Lisa Laplace  
Christopher T. Dunn  
125 Broad Street, 19th Floor  
New York, NY 10004  
(212) 607-3300  
[mbiklen@nyclu.org](mailto:mbiklen@nyclu.org)

THE LEGAL AID SOCIETY

By: s/ Corey Stoughton

Corey Stoughton  
Jennvine Wong  
Rigodis Appling  
Paula Garcia-Salazar  
199 Water Street  
New York, NY 10038  
(212) 577-3367  
[cstoughton@legal-aid.org](mailto:cstoughton@legal-aid.org)

*Co-Counsel for Plaintiffs in Payne v. de Blasio, 20 Civ. 8924*

LETITIA JAMES

*Attorney General of the State of New York*

By: /s/ Lillian Marquez

Lillian Marquez, *Assistant Attorney General*  
Swati Prakash, *Assistant Attorney General*  
Travis England, *Assistant Attorney General*  
Office of the New York State Attorney General  
28 Liberty Street, 20th Floor  
New York, NY 10005  
(212) 416-8250

*Counsel for Plaintiff in People of the State of New York v. City of New York, No. 21-cv-322*

DAVIS WRIGHT TREMAINE LLP

/s/Robert D. Balin

Robert D. Balin  
Abigail B. Everdell  
Kathleen Farley  
Nimra Azmi  
1251 Avenue of the Americas, 21<sup>st</sup> Floor  
New York, NY 10020  
Phone: (212) 489-8230  
Fax: (212) 489-8340  
robbalin@dwt.com

Mickey H. Osterreicher, Esq.  
70 Niagara Street  
Buffalo, NY 14202  
Phone: (716) 983-7800  
lawyer@nppa.org

WYLIE STECKLOW PLLC

By: Wylie Stecklow  
Wylie Stecklow PLLC  
Carnegie Hall Tower  
152 W. 57<sup>th</sup> Street, 8<sup>th</sup> Floor  
NYC NY 10019  
t: 212 566 8000  
[Ecf@wylielaw.com](mailto:Ecf@wylielaw.com)

Alicia Calzada (*pro hac vice*)  
ALICIA WAGNER CALZADA, PLLC  
Deputy General Counsel  
National Press Photographers Association  
12023 Radium , Suite B1  
San Antonio, TX 78216  
Phone: 210-825-1449  
[Alicia@calzadalegal.com](mailto:Alicia@calzadalegal.com)  
Wylie Stecklow

*Counsel for Plaintiffs in Gray, et al v. City of New York, et al, No. 21-cv-06610*

The Aboushi Law Firm PLLC

/s/Tahanie A. Aboushi

Tahanie A. Aboushi, Esq.

Aymen A. Aboushi, Esq.  
The Aboushi Law Firm  
1441 Broadway, 5th Floor  
New York, NY 10018  
Tel: (212) 391-8500  
Fax: (212) 391-8508  
Aymen@Aboushi.com  
Tahanie@Aboushi.com

*Counsel for Plaintiffs in Rolon, et al v. City of New York, et al, No. 21-cv-2548*

**SO ORDERED:**

Dated: \_\_\_\_\_  
New York, New York

\_\_\_\_\_  
Hon. Gabriel Gorenstein